

RE: 22-CV-10018 Doe v Deutsche & 22-CV-10019 Doe v JP Morgan

Memo: General Communication to the Court  
Notice of Sanctions Motion, *inter alia*

To the Court,

This letter is not to be treated as an application or motion. It is general communication notifying the court of the following:

1. In the consolidated class actions referenced above ("*Deutsche*" & "*JP Morgan*") I made objections to the court citing *Bracy v. Gramley*, 520 U. S. 899 (1997), *collusion*, & made requests that *discovery* be permitted along with a continuance of the final fairness hearing in order to address the objections & any relevant filings made right before the final fairness hearing (such as the requests for *discovery*, objections from other parties to the case) , *inter alia*.
2. In my objections I suggested Mr. Rakoff should recuse himself *sua sponte* citing *Bracy*; &, argued that class counsels' *gross conflicts of interest* are unwaived, requiring they resign or obtain a waiver indicating that they have taken proper action to disprove my arguments that they cannot provide adequate counsel due to this conflict causing bias in their representation.
3. Both parties refused to redress these issues raised in the objections through thorough analysis & argument or recusal prior to the final fairness hearing; clearly violating their fiduciary duty owed to the class members.
4. On 11/21/23 while viewing Pacer to submit this letter to the court, I learned class counsel submitted a response to my request for *discovery* at some point after the final fairness hearing & without any direct notice/service to me. In class counsels' arguments opposing discovery Boies ("lead counsel") appears to have renewed class counsels' sanctionable arguments of alleging I made/make "meritless" legal accusations by citing *Latham*.
5. For that reason, at this time, I will direct the court, class counsel (& the public it hopes to pander to) to paragraph 30 in the addendum to the letter submitted in *Deutsche*. There, I made brief response to class counsels' Opposition to my Objections by pointing out that Boies knows he's named as a co-defendant in the unresolved legal action (*Latham*) no matter what Stanton's fraudulent court order asserts. And, furthermore, Stanton's fraudulent order still asserts *no prejudice in dismissal*; Thus: my legal claims are still valid & litigable; which makes citing *Latham* in these class actions ridiculous & sanctionable.
6. This Court, nor class counsel, served me with any notice or copy of the judicial officer's *Opinion* or class counsels' reply brief Opposing Discovery; despite having my electronic service address & consent to use it or standard mail. The only reason I have knowledge of these recent filings is because I reviewed PACER before filing this letter with the court; and this letter does not serve as any formal response/motion. I simply wanted to direct the parties to the facts that may inspire them to begin executing their fiduciary & professional duties to me/the class lawfully.
7. I will be serving class counsel, et al with a Sanctions Motion to demand they amend/correct the issues raised in the forthcoming sanctions motion.
8. After expiration of the Safe Harbor grace period , pursuant to Rule 11, I will file that same motion with the SDNY court for oral arguments and judgment.
9. In addition to the forthcoming Motion for Sanctions, several other post-judgment motions are being filed where I will respond fully to class counsels' frivolous opposition arguments in their written oppositions to *objections* or *discovery* in *Deutsche* or *JP Morgan*.

10. Post-judgment motions include one or more formal Motion(s) to Vacate the Order Approving Class Action Settlement, formal Motion for Judicial Recusal/Substitution of Jed Rakoff, *inter alia*.
11. I will layout the relevant laws, facts & arguments with exhibits/evidence including potentially calling witnesses to argue support for these post-judgment motions.
12. In addition to these post-judgment motions in this court, I am obligated to file several administrative legal actions across several agencies (within & outside of this court) to complain of & redress the various ethics violations, misconduct & civil/human rights violations that occurred in this court & litigation cycle.
13. This letter notifies the court & parties of the pending post-judgment motions; this letter is not an application or motion and should not be treated as such.
14. Class counsel may use this notice to withdraw or amend their arguments citing *Latham* before the motion for sanctions is formally served to them & the Safe Harbor period begins tolling. Relying on *Latham* is a clearly vexatious & frivolous extension of the fraud committed in *Latham*.
15. For these reasons, and others, it will take a reasonable amount of time to serve & file the various post-judgment motions I have given this court notice of with this letter. This letter is only intended to give the court & parties notice of the post-judgment motions pending filing in this court.
16. I will file the official *Notice of Appeal* to initiate the formal appellate proceedings in the 2nd Circuit after briefing completes on the post-judgment motions.

Date: 11/23/2023

Signature:

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